

# SEIDEN | LAW

November 5, 2024

**VIA ECF AND EMAIL**

Hon. John G. Koeltl  
United States District Judge  
United States District Court, Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *Raanan et al. v. Binance Holdings Limited et al.*, 1:24-cv-00697-JGK-BCM (S.D.N.Y)**

Dear Judge Koeltl:

We write on behalf of Plaintiffs and in response to Defendants' October 17, 2024 letter (ECF 39) concerning Defendants' motion pursuant to 28 U.S.C. § 1404(a) to transfer to this Court the action captioned *Gess et al. v. BAM Trading Services, Inc., et al.*, 2:24-cv-00134-ECM-CWB (M.D. Ala.). Pursuant to Rules I.A and I.F of Your Honor's Individual Practices, we attach hereto for the Court's determination as Exhibits A and B, respectively, Defendants' opening and reply briefs on the transfer motion, as these filings may be relevant to the Court's determination of whether Defendants, by filing the transfer motion, waived their challenges to personal jurisdiction in this District.<sup>1</sup>

Respectfully submitted,

/s/ Jake Nachmani

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cc: All counsel of record (via ECF)

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<sup>1</sup> See *Olvera-Morales v. Int'l Lab. Mgmt. Corp., Inc.*, 2005 WL 8167435, at \*6-7 (N.D.N.Y. June 15, 2005) ("By making the motion to transfer, [defendant] has implicitly waived any defense it might have on the ground of lack of *in personam* jurisdiction in North Carolina [and] . . . any such defense is deemed waived.").